

1 Honorable James L. Robart  
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5 IN THE UNITED STATES DISTRICT COURT  
6 FOR THE WESTERN DISTRICT OF WASHINGTON  
7 AT SEATTLE

8 PHILIPS NORTH AMERICA LLC, a Delaware  
9 Company; KONINKLIJKE PHILIPS N.V., a  
10 Company of the Netherlands; and PHILIPS  
11 INDIA, LTD., an Indian Company,

12 Plaintiff,

13 v.

14 SUMMIT IMAGING INC., a Washington  
15 Corporation; LAWRENCE R NGUYEN, an  
16 individual; and DOES 1-10, inclusive,

17 Defendants.

18 Civil Action No.: 2:19-cv-01745-JLR

19 **STIPULATION AND [PROPOSED]  
20 ORDER TO EXTEND TIME FOR  
DEPOSITIONS OF SONIA SMITH,  
DREW VOTH, AND PATRICK  
KENNEDY**

21 Note on Motion Calendar:  
22 Thursday, March 25, 2021

23 **STIPULATION**

24 Plaintiffs Philips North America LLC, Koninklijke Philips N.V. and Philips India, Ltd. and  
25 Defendants Summit Imaging, Inc. and Lawrence R. Nguyen, by and through their undersigned  
26 counsel of record, hereby stipulate and agree as follows:

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1. Under the Court's Minute Order Setting Trial Dates and Related Dates ("Minute  
2 Order"), the close of discovery was Monday, March 22, 2021 (Dkt. 71).
2. On Monday, March 22, 2021, Summit's damages expert, Mr. Drew Voth, submitted a  
3 corrected version of his expert report, which relied on newly-produced documents. In  
4 order to permit Philips to address the corrected report and newly-produced documents,  
5 and other newly-produced documents produced by Summit at Philips' request after  
6 March 22, the parties are agreed—subject to the Court's approval—to the following:

7 STIPULATION AND [PROPOSED] ORDER TO  
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9 SMITH, DREW VOTH, AND PATRICK KENNEDY  
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1                             (a) Mr. Voth's deposition will be continued on March 26, 2021; (b) Ms. Sonia Smith,  
2                             a Summit employee, will also be deposed on March 26, 2021; and (c) Philips' damages  
3                             expert, Dr. Patrick Kennedy, will be deposed on April 2, 2021.

4                             3. The parties agree that all other deadlines in the Minute Order shall remain unchanged.

5                             SO STIPULATED AND AGREED: March 25, 2021.

6                             **SAVITT BRUCE & WILLEY LLP**

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36                             *Philips N.V., and Philips India Ltd.*

37                             **STIPULATION AND [PROPOSED] ORDER TO**  
38                             **EXTEND TIME FOR DEPOSITIONS OF SONIA**  
39                             **SMITH, DREW VOTH, AND PATRICK KENNEDY**  
40                             2:19-cv-01745-JLR

6                             **SEED IP LAW GROUP LLP**

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19                             *Attorneys for Defendants,*  
20                             *Summit Imaging Inc. and*  
21                             *Lawrence R. Nguyen*

## ORDER

It is so ORDERED.

DATED this 25th day of March, 2021.

THE HONORABLE JAMES L. ROBART  
United States District Judge

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